

### REMARKS

Claims 1-28 are pending in the present Application. Claims 1, 11, 18 and 21 have been amended, leaving Claims 1-28 for consideration upon entry of the present Amendment. No new matter has been introduced by these amendments. Support for the Amendments can be found in at least paragraphs [0014], [0058], [0061], and [0065]. Reconsideration and allowance of the claims are respectfully requested in view of the above amendments and the following remarks.

Applicants acknowledge and thank the Examiner for the withdrawal of the objections to the drawings, specification and claims. Applicants acknowledge and thank the Examiner for the withdrawal of the 35 U.S.C. § 112, second paragraph rejection. Applicants further acknowledge and thank the Examiner for the withdrawal of the 35 U.S.C. § 101 rejection.

#### First Claim Rejection Under 35 U.S.C. § 103(a)

Claims 1-4, 6, 8, 9, 11-16, 18-26 and 28 are rejected under 35 U.S.C. § 103(a), as allegedly unpatentable over Son et al. ("Automatic Generation of Simulation Models from Neutral Libraries: An Example", Proceedings of the 2000 Winter Simulation Conference", Volume 2, pages 1558-1567, Orlando, FL, December 2000) in view of Kosiba et al. (US Patent 7,103,562). Applicants respectfully traverse this rejection. Applicants respectfully submit that the claim recitation "a server to perform a simulation of the process by processing the simulation model and to generate an output data file containing output data representative thereof and configured to be stored as a future model template in the database and as input to the model application" is not taught or made obvious in the cited sections of Son et al., that is, section 1, Figure 1, section 3.6; section 5.4, Figure 6; conclusion, lines 9-12. None of the cited sections teach or make obvious that the output can be stored as a future model template. Applicants have amended Claim 1 to further recite, "a server to perform a simulation of the process by processing the simulation model and to generate an output data file containing output data representative thereof and configured to be stored as a future model template in the database for at least one additional simulation and as input to the model application", which is not taught or made obvious in either Son et al. or Kosiba, alone or in combination. Applicants have further amended Claim to recite, among other things, "a database to store a plurality of models, each model including a

plurality of one or more entity, task, and resource parameter, each model associated with a model template having a plurality of tables representative of each of the plurality of one or more entity, task, and resource parameter, wherein the database is configured to store a plurality of model objects that include modeling data, algorithms and I/O of at least one of standalone models, models deployed in decisioning, and historical models from prior simulations;

a model application in communication with the database and configured to receive commands from a user, to retrieve one of the plurality of models and the corresponding plurality of one or more entity, task, and resource parameter in response to a user command, to receive input data corresponding to one or more entity, task, and resource parameter from a business database system, to perform allocations of the one or more of entity, task and resource parameter, to store the allocations in the database and to generate a simulation model based on the business database system, the allocations that are retrieved from the database by the model application to generate the simulation model and the input data, wherein the model application is further configured to build each model from combined model objects that instantiate new object models”.

Applicants have similarly amended Claims 11, 18 and 21. Applicants respectfully submit that Claims 1-28 are non-obvious over Son et al in view of Kosiba.

#### Second Claim Rejection Under 35 U.S.C. § 103(a)

Claims 5, 7, 10, 17 and 27 are rejected under 35 U.S.C. § 103(a), as allegedly unpatentable over Son et al in view of Kosiba et al as applied to Claims 1, 11 and 21 above, and further in view of Fontana et al (US Patent 6, 167, 564). Applicants respectfully traverse this rejection. Applicants respectfully submit that Claims 5, 7 and 10 depend from Claim 1 and are non-obvious over Son et al in view of Kosiba for at least the reasons advanced with reference to Claim 1. Claim 17 depends from Claim 11 and is non-obvious over Son et al in view of Kosiba for at least the reasons advanced with reference to Claim 1. Claim 27 depends from Claim 21 and is non-obvious over Son et al in view of Kosiba for at least the reasons advanced with reference to Claim 1.

Applicants respectfully request a withdrawal of the rejection and an allowance of the claims.

It is believed that the foregoing amendments and remarks fully comply with the Office Action and that the claims herein should now be allowable to Applicants. Accordingly, reconsideration and allowance are requested.

If there are any additional charges with respect to this Amendment or otherwise, please charge them to Deposit Account No. 07-0868.

Respectfully submitted,

CANTOR COLBURN LLP

By 

Greg O'Bradovich

Registration No. 42,945

Date: August 27, 2007  
CANTOR COLBURN LLP  
55 Griffin Road South  
Bloomfield, CT 06002  
Telephone (860) 286-2929  
Facsimile (860) 286-0115  
Customer No.: 23413